

abuses, to respect democratic principles and institutions and the rule of law; to refrain from actions, policies or activities which repress civil society in Zimbabwe and to comply with international human rights law and to respect human rights. ...

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## 8. Singapore Customs Circulars of Interest: TradeNet Extended Downtime

(Source: [Singapore Customs](#), 29 Mar 2019.)

Singapore Customs has released the following document(s) on its website:  
*Notices*

\* Notice No: 04/2019: [TradeNet Extended Downtime](#)

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## NEWS

## 9. Reuters: "Exclusive: Trump Eyeing Stepped-Up Venezuela Sanctions for Foreign Companies - Bolton"

(Source: [Reuters](#), 29 Mar 2019.) [Excerpts.]

U.S. President Donald Trump is considering imposing sanctions on companies from other countries that do business with Venezuela to cut off revenues to President Nicolas Maduro, Trump's national security adviser John Bolton told Reuters TV on Friday.

"We're moving exactly in that direction," Bolton said when asked whether Trump would consider what are known as "secondary sanctions."

"We are even now looking at a series of additional steps we could take," Bolton said in the interview.

The United States and most other Western countries have thrown their backing behind Venezuelan opposition leader Juan Guaido, who invoked the constitution in January to declare himself interim president, arguing that Maduro's 2018 re-election was illegitimate.

Oil provides 90 percent of export revenue for OPEC member Venezuela. The United States imposed sanctions on Venezuela's state-owned oil company

PDVSA in January, preventing U.S. companies from dealing with it unless revenues went to a fund available to Guaido.

The Trump administration has not yet slapped sanctions on companies from other countries that do business with PDVSA - but U.S. officials have been having "conversations" with oil trading houses and governments around the world to convince them to scale down their dealings with Maduro, Trump's Venezuela envoy Elliott Abrams said earlier on Friday. ...

Trump is looking at options - including sanctions - to respond to Russia's growing military presence in Venezuela, Bolton said. Two Russian air force planes carrying nearly 100 military personnel landed outside Caracas on Saturday.

"We're not afraid to use the phrase 'Monroe Doctrine' in this administration," Bolton said, referring to the 1823 policy established by then-President James Monroe, widely seen in Latin America as a justification for U.S. armed intervention in the region.

"And one of the purposes of the Monroe Doctrine was to prevent foreign interference and even recolonization," Bolton said.

"If you look at the presence of Cuban and Russian forces in Venezuela, you have to ask when will the people of Venezuela get to choose their government rather than foreigners?" he said. ...

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## 10. World Nuclear News: "WANO Warns Export Controls are Affecting its Work"

(Source: [World Nuclear News](#), 28 Mar 2019.) [Excerpts.]

The World Association of Nuclear Operators (WANO) announced today it is encouraging governments worldwide to ensure that national export control laws do not adversely affect its ability to maximize the safe operation of commercial nuclear power plants.

Export controls ensure that goods, equipment and technical information exported from a country or area do not contribute to the proliferation of nuclear weapons, and also protect national and international security by restricting access to sensitive nuclear technologies, materials and capabilities. However, WANO says some nations' export control arrangements are impacting its ability to conduct activities focused on the safe operation of existing commercial nuclear power plants. ...

WANO said its policy is to avoid exchanging information that is subject to export controls, adding it is primarily focused on assessing management processes and behaviors relating to safety - and not technology transfer. In recent years, there have been "increasing instances", it said, where some

WANO employees are unable to participate in WANO peer reviews and member support missions at other member plants.

The situation has become more challenging since the Nuclear Suppliers Group (NSG) revised its Guidelines in 2013, WANO said, adding that it is engaging with the NSG and national governments to explain its position.

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## COMMENTARY

### 11. J. Reeves & K. Heubert: "Please Meet the Office of Export Enforcement"

(Source: [Reeves & Dola LLP Alert](#), 29 Mar 2019.) [Available by subscription via [info@reevesdola.com](mailto:info@reevesdola.com).]

\* Authors: Johanna Reeves, Esq., [jreeves@reevesdola.com](mailto:jreeves@reevesdola.com); and Katherine Heubert, Esq., [kheubert@reevesdola.com](mailto:kheubert@reevesdola.com). Both of Reeves & Dola LLP.

As we inch closer to the publication of the final rules containing the rewrites to the International Traffic in Arms Regulations (ITAR) U.S. Munitions List (USML) Categories I, II and III, we continue with our series of alerts introducing those in the export community who may be less familiar with the various differences between the ITAR and the Export Administration Regulations (EAR). One of those differences is the way each agency handles enforcement activities. In this alert we will take a look at the U.S. Department of Commerce, Bureau of Industry and Security (BIS), Office of Export Enforcement (OEE).

Most folks in the firearms and ammunition industries are familiar with the Department of State, Directorate of Defense Trade Controls (DDTC), Office of Defense Trade Controls Compliance (DTCC). DDTC is responsible for the civil enforcement of the ITAR, and works with U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP), who has the authority to investigate, detain, or seize any export or attempted export of defense articles or technical data contrary to the ITAR. Any criminal matters arising from a disclosure to DDTC are referred to the U.S. Department of Justice. When it comes to questions of compliance with the ITAR, the DTCC Compliance Specialists are responsible for reviewing and adjudicating any voluntary or directed disclosures of suspected violations of the ITAR and assessing any administrative penalties deemed warranted.

BIS administers and enforces export controls on items subject to the EAR under the authority of the Export Control Reform Act of 2018 (ECRA). Its [Export Enforcement arm \(EE\)](#) is made up of the Office of Export Enforcement (OEE), the Office of Enforcement Analysis (OEA), and the Office

of Antiboycott Compliance (OAC). EE "protects and promotes U.S. national security, foreign policy, and economic interests by investigating violations, interdicting illegal exports, conducting end use checks, educating parties to export transactions on how to improve export compliance practices and identify suspicious inquiries, supporting the licensing process by evaluating the bona fides of transaction parties, and aggressively pursuing violators of export control laws for criminal prosecution or administrative penalties."

In this alert, we focus on OEE, whose Special Agents are sworn federal law enforcement officers with authority to bear firearms, execute search warrants, serve subpoenas, make arrests, detain and seize items about to be illegally exported, and order the redelivery to the United States of items exported in violation of U.S. law. OEE is the only federal law enforcement agency exclusively dedicated to the enforcement of export control laws (the EAR), and it works closely with the Department of Justice to prosecute criminal violations, and with the Office of Chief Counsel for Industry and Security for civil enforcement cases.

BIS has the resources to send special agents to investigate suspected violations of the EAR. This includes investigating suspected export violations by U.S. persons, as well as suspected unauthorized reexports or transfers by foreign persons. As outlined on [BIS's website](#), OEE Special Agents also conduct end-use checks to confirm items are being used in accordance with any license conditions, as well as to assess the suitability of foreign end-users to receive U.S.-origin licensed goods and technology, assess prospective end-users on pending license applications for diversion risk, and conduct educational outreach to foreign trade groups.

BIS assembles summaries of recent enforcement activity into its [Don't Let This Happen to You](#) publication, which is typically updated annually. As noted in its November 2018 edition, "in fiscal year 2017, BIS investigations led to the criminal convictions of 31 individuals and businesses for export violations with penalties of over \$287 million in criminal fines, more than \$166 million in forfeitures, and 576 months of imprisonment. In addition, OEE and BIS's Office of Chief Counsel completed 52 administrative export matters, resulting in over \$692 million in civil penalties." (p. 4). In contrast, DDTC issued only two [consent agreements](#) in 2017 and 2018 combined.

Now, this is not to say that BIS throws the book at every entity that comes in with a voluntary self-disclosure, or even every entity that is investigated. Quite the opposite. The majority of voluntary self-disclosures are closed with the issuance of a warning letter and without administrative penalty, much like DTCC. However, your odds for finding yourself with an OEE Special Agent knocking on your door if you violate the EAR are higher.

OEE also participates in the Export Enforcement Coordination Center (E2C2) along with 14 other federal agency partners. The Center is housed in the Department of Homeland Security; the Director of the Center is from DHS, and the two Deputy Directors are from BIS and FBI. The following is a list of the partner agencies:

- U.S. Department of Commerce, Bureau of Industry and Security, Office of Export Enforcement
- U.S. Department of Defense, Air Force Office of Special Investigations
- U.S. Department of Defense, Defense Criminal Investigative Service
- U.S. Department of Defense, Defense Intelligence Agency
- U.S. Department of Defense, Defense Security Service
- U.S. Department of Defense, Naval Criminal Investigative Service
- U.S. Department of Energy, National Nuclear Security Administration
- U.S. Department of Homeland Security, Customs and Border Protection
- U.S. Department of Homeland Security, Immigration and Customs Enforcement
- U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives
- U.S. Department of Justice, Federal Bureau of Investigation
- U.S. Department of Justice, National Security Division
- U.S. Department of State, Directorate of Defense Trade Controls
- U.S. Department of the Treasury, Office of Foreign Assets Control
- U.S. Export-Import Bank, Office of the Inspector General
- U.S. Postal Service, Postal Inspection Service
- Office of the Director of National Intelligence, Office of the National Counterintelligence Executive

Below is a sampling of EAR criminal and administrative cases. For a full list of recent enforcement cases, please refer to [Don't Let This Happen to You \(Nov. 2018\)](#). As you will see, these cases are not limited to violations involving items that are enumerated on the Commodity Control List (CCL), but also include items classified as EAR99. The criminal and administrative cases run the gambit and illustrate the importance of maintaining a robust compliance program:

(1) The Violation: On April 15, 2015, Hassan Jamil Salame pled guilty in U.S. District Court for the District of South Carolina to charges related to the attempted smuggling of shotguns and other firearms and ammunition classified under ECCN 0A984 from the United States to Lebanon. Salame attempted to export the items to Lebanon without the required export licenses and knowingly failed to declare the items on Shipper's Export Declarations. This case resulted from a joint investigation with OEE's Washington Field Office, ICE, ATF, and CBP.

The Penalty: On November 3, 2015, Salame was sentenced to 45 months in prison, 36 months of probation, and a \$300 special assessment. Additionally, Salame agreed to a 10-year denial of export privileges.

(2) The Violation: From November 2003 to August 2010, Boniface Ibe of Mitchellville, Maryland bought 194 shotguns and a .22 caliber handgun from firearm dealers in the Washington, DC and Baltimore metropolitan areas. In September 2010, law enforcement inspected one of Ibe's shipping containers destined for Nigeria and discovered eight shotguns, one .22 caliber handgun and .22 caliber ammunition concealed in a car inside the container. Shotgun ammunition was found in another vehicle in the

container. Dock receipts indicated that an individual in Nigeria was to receive the container, as well as at least four other containers shipped to Nigeria in 2008 and 2009. The handgun and ammunition are controlled under the International Traffic in Arms Regulations and the shotguns are classified under ECCN 0A984 for export by the U.S. Department of Commerce, all of which require a license for export. On February 9, 2011, Ibe pled guilty in U.S. District Court in the District of Maryland to violating IEEPA, illegally exporting defense articles, and delivering a firearm to a common carrier without written notice. This case resulted from a joint investigation conducted by OEE's Washington Field Office, ICE, and ATF.

**The Penalty:** On July 11, 2011, Ibe was sentenced to five months in prison, 10 months of supervised release, and a \$300 special assessment. Ibe is listed on the U.S. Department of State's Debarred List and, pursuant to an order issued by BIS on December 21, 2012, is the subject of a ten-year denial order.

(3) **The Violation:** On 21 occasions between 2006 and 2007, Dreco Energy Services Ltd. of Canada caused, aided and/or abetted the export from the United States to Iran, via Canada, of EAR99 U.S.-origin oil and gas equipment valued at \$2,315,253 without the required authorization. After ordering and obtaining the items from the U.S. without disclosing that the items were intended to fulfill orders from Iranian customers, Dreco Energy Services Ltd. transshipped the items from Canada to Iran, and specifically to the National Iranian Drilling Company and to Kala Naft, the procurement arm of the National Iranian Oil Company. In 2012, National Oilwell Varco (NOV) sold and/or transferred filament winder mandrels valued at \$69,615 to Oman. The filament winder mandrels were classified under ECCN 1B201 and required an export license. NOV had applied for and received an export license from BIS for a total of nine filament winder mandrels, but instead exported a total of 21 of the items. This case resulted from a joint investigation conducted by OEE's Houston Resident Office and ICE.

**The Penalty:** On November 8, 2016 NOV signed a Non-Prosecution Agreement (NPA) with BIS, DOT, OFAC, ICE, and DOJ. The NPA specifies that NOV forfeit \$22,500,000 in funds to the DOT Forfeiture Fund. Additionally, on November 8, 2015, Dreco Energy Services Ltd. and NOV agreed to pay a \$2,500,000 civil penalty to BIS.

(4) **The Violation:** On two occasions during 2012, Cryofab, Inc. of Kenilworth, New Jersey, engaged in conduct prohibited by the EAR by exporting gas storage containers and related tools and accessories designated EAR99 to the Bhabha Atomic Research Center (BARC), without the required BIS export licenses. At the time of the exports, BARC appeared on the BIS Entity List. Although an experienced exporter, Cryofab Inc. failed to screen against the BIS Entity List in connection with these two transactions, and failed to seek or obtain the required BIS export licenses. It also erroneously listed the items as eligible for shipment without a license on the Shipper's Letter of Instructions for each shipment. This case resulted from an investigation conducted by OEE's New York Field Office.

The Penalty: On August 18, 2017, Cryofab, Inc. agreed to pay a \$35,000 civil penalty. The company was also ordered to complete an external audit of its export controls compliance program, to be conducted by an unaffiliated third-party consultant.

(5) The Violation: On 53 occasions between 2011 and 2012, Federal Express (FedEx), located in Memphis, Tennessee, facilitated the export of civil aircraft parts and equipment used for electronic microscope manufacturing classified under ECCN 9A991 or 7A994, or designated EAR99, and valued at approximately \$58,091 from the U.S. to Aerotechnic France (Aerotechnic), or to the Pakistan Institute for Nuclear Science and Technology (PINSTECH) in Pakistan, without the required BIS licenses. Aerotechnic was added to the BIS Entity List in June 2011 "based on evidence that [it had] engaged in actions that could enhance the military capability of Iran, a country designated by the U.S. Secretary of State as having repeatedly provided support for acts of international terrorism...[and] because [its] overall conduct posed(d) a risk of ongoing EAR violations. PINSTECH is a subordinate entity of the Pakistan Atomic Energy Commission, and has been on the BIS Entity List since November 1988, when it was added to the Entity List along with a number of other Pakistani government (and parastatal and private) entities involved in nuclear or missile activities shortly after Pakistan detonated a nuclear device.

The Penalty: On April 24, 2018 FedEx agreed to pay a \$500,000 civil penalty.

(6) The Violation: In 2009, Griffin & Howe entered into a Settlement Agreement with BIS in connection with alleged unlicensed exports in violation of the EAR over a four-year period from July 2004 to April 2008. The alleged violations consisted of two instances of exporting optical sighting devices (ECCN 0A987) to Zambia without the required licenses, and four instances of exporting shotguns (ECCN 0A984) to Canada and Chile without the required licenses.

The Penalty: The company was assessed a civil penalty of \$67,000.

These cases illustrate the need to know your customer (screening), the details of your transaction (including the chain of custody in shipping), as well as the importance of properly filing export documentation with U.S. Customs and Border Protection. They also reflect the wide variety of penalties and oversight actions that BIS can impose on a company found to have violated the EAR. We say all of this not to strike fear in the hearts of our readers about BIS and the EAR, but to underscore that transiting to the EAR will not be a lessening of controls or oversight. To the contrary, it will provide more resources to investigating compliance concerns. BIS has experience overseeing the export of firearms (shotguns) as well as arguably every other product under the sun, so they are ready. With OEE's Special Agents, there will now be a dedicated law enforcement agency to investigate potential export control violations both at home and abroad.

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12. R.C. Thomsen II, A.D. Paytas & M.M. Shomali:  
"Changes to Export Controls in March 2019"

(Source: Thomsen and Burke LLP, 29 Mar 2019. Available by subscription via [maher@t-b.com](mailto:maher@t-b.com).) [Excerpts.]

\* Authors: Roszel C. Thomsen II, Esq., +1 410-539-2596, [roz@t-b.com](mailto:roz@t-b.com); Antoinette D. Paytas, Esq., +1 410-539-2655, [toni@t-b.com](mailto:toni@t-b.com); and Maher M. Shomali, Esq., +1 410-539-6336, [maher@t-b.com](mailto:maher@t-b.com). All of Thomsen and Burke LLP.

This memo summarizes the regulatory and enforcement developments with respect to U.S. and multilateral export controls during the month of March 2019. ...

### **Regulatory Updates**

#### *BIS Seeks Comments Regarding Items Transferred from USML Categories IV and XV to CCL Categories 0 and 9*

As part of its work with the National Space Council, the Bureau of Industry and Security, Department of Commerce requests public comment to inform its review of the controls implemented in recent revisions to Categories IV and XV of the United States Munitions List (USML) and the related transfer of items to the Department of Commerce's Commerce Control List (CCL). These items include launch vehicles, guided missiles, ballistic missiles, rockets, torpedoes, bombs, and mines; and spacecraft and related articles. BIS's review seeks to ensure that the CCL describes these items clearly, captures those items in normal commercial use, accounts for technological developments, and implements the national security and foreign policy objectives of the United States properly. In particular, BIS seeks comment on ways to thoughtfully streamline export control regulations for both the U.S. commercial space industry as well as our international partners to lower administrative burden, decrease regulatory compliance costs as well as increase exports thereby bolstering the U.S. space commercial sector and industrial base. Comments must be received by BIS no later than April 22, 2019 and may be submitted through the [Federal rulemaking portal](#).

BIS's request for comments include the following questions:

(1) For technologies controlled under ECCN 9A515--examples include habitats, planetary rovers, and planetary systems such as communications and power--what factors or specific technologies should be considered for movement to a different ECCN or paragraph under ECCN 9A515 with less stringent licensing requirements?

(2) The USG is considering further refinement or updated controls on the various technologies listed below. Are there additional specific space-related technologies not described in the list which warrant further review by State or Commerce given their current or anticipated near term commercial applications?



(3) NASA continues to pursue development of the future Lunar Gateway, which may be described in USML Category XV(a). If moved to the CCL, what would be the appropriate controls to apply to items associated with the Lunar Gateway, e.g., ECCNs 9A515 or 9A004?

(4) Are there technologies controlled in the USML for either Category IV and XV, which are not currently described or not described with sufficient clarity which the commenter believes should be controlled under the EAR? While this notice discusses specific items based on initial communications with industry, the list is not exhaustive and commenters are encouraged to provide additional examples within both USML categories.

(5) Are there specific defense articles which have entered into normal commercial use since the most recent revisions? If so, please provide sufficient detail in describing and identifying the article to support your claim. Commenters may include documentation to support this claim, e.g., product information demonstrating what is currently in the market (web pages describing products and product brochures), or scientific and industry articles, in particular those also describing trends in commercial products, that resulted from new technologies or manufacturing methods.

(6) Are there defense articles for which commercial use is proposed, intended, or anticipated in the next five years? If so, provide sufficient detail in describing and identifying the article to support your claim. Commenters may include documentation to support this claim, e.g., product development or marketing information describing what products will soon to be in the market (web pages describing products under development, press releases related to products under development) or scientific and industry articles, in particular those describing new products that may soon enter the market place as a result of new technologies or manufacturing methods.

(7) Are there other technical issues for these items which BIS should address, e.g., the addition of technical notes or defined terms used in the control parameters to make the controls easier to understand and apply consistently?

(8) What are the cost savings to private entities by shifting control of additional specific commercial items from the USML to the CCL? To the extent possible, please quantify the current cost of compliance with USML control of an item and any cost savings if a particular change was implemented. Cost savings could include time saved in terms of regulatory uncertainty over whether certain items are regulated as on the USML or the CCL. This reduced uncertainty, under the "bright line" approach of the USML to CCL review process, would allow both BIS and industry to avoid spending hours and resources on case by case determinations for certain items. As much as possible, please quantify time saved, reduction in compliance costs, and reduction in paperwork.

Additional information can be found in the [Federal Register notice](#). The State Department published a corresponding rule, which can also be found in the [Federal Register](#).

*OFAC Recent Actions and Designations ...*

*USTR Postpones Additional Duty Rate on Chinese Products Covered under September 2018 Action ...*

## **Enforcement Actions**

### *Settlement Agreement between OFAC and Stanley Black & Decker and its foreign subsidiary*

OFAC announced a \$1,869,144 settlement with Stanley Black & Decker, Inc. and its foreign subsidiary, Jiangsu Guoqiang Tools Co., Ltd. (GQ). Stanley Black & Decker, a company based in New Britain, Connecticut, on behalf of itself and its subsidiary located in China, GQ, has agreed to settle its potential civil liability for 23 apparent violations of the Iranian Transactions and Sanctions Regulations, 31 C.F.R. part 560 (ITSR).

Specifically, between on or about June 29, 2013 and on or about December 30, 2014, GQ exported and attempted to export 23 shipments of power tools and spare parts, with a total value of \$3,201,647.73, to Iran or to a third country with knowledge that such goods were intended specifically for supply, transshipment, or reexportation, directly or indirectly, to Iran, which would have been prohibited if engaged in by a U.S. person, under §§ 560.203 and 560.204 of the ITSR. These transactions appear to have violated § 560.215 of the ITSR. OFAC determined that Stanley Black & Decker voluntarily self-disclosed the apparent violations on behalf of GQ, and that the apparent violations constitute an egregious case.

Stanley Black & Decker began acquisition negotiations with GQ in 2011, during which it engaged in due diligence and discovered GQ exported to Iran. Stanley Black & Decker took steps to encourage GQ to cease sales to, and transactions with, Iran prior to the acquisition date and made ceasing such sales a prerequisite condition of the closing. GQ's representatives agreed to these terms and conditions. In May 2013, Stanley Black & Decker acquired a 60 percent interest in GQ and created a joint venture with the firm.

Subsequent to its acquisition of GQ, Stanley Black & Decker provided a series of trainings to GQ's employees on the company's business conduct guidelines, the Foreign Corrupt Practices Act, and sanctions. Specifically, in early August 2013 a Stanley Black & Decker Global Trade Compliance for China employee reviewed the company's trade compliance policies and procedures with GQ's Manager for Export Sales by telephone. After this one training session, the individual who conducted the training asked the GQ Manager for Export Sales to provide the same training to her team within GQ, and to designate two members of her team to attend additional training on a customer screening tool. However, Stanley Black & Decker did not implement procedures to monitor or audit GQ's operations to ensure that its Iran-related sales did not recur post-acquisition.

Despite the written agreements GQ's senior management executed in which they attested that GQ would not engage in transactions with Iran, and notwithstanding the above-referenced trainings Stanley Black & Decker provided, GQ continued to export goods to Iran throughout 2013 and 2014. Once Stanley Black & Decker became aware of the potential violations of

U.S. economic sanctions, it initiated an internal investigation, subsequently hired a third-party independent investigative company, and ultimately reported the matter to OFAC.

Stanley Black & Decker's internal investigation determined various GQ board members and senior management participated in these activities with knowledge that such conduct violated its parent company's policies and U.S. economic sanctions against Iran. These personnel and other GQ employees appear to have engaged in non-routine business practices in order to conceal and facilitate GQ's prohibited exports to Iran. GQ utilized six trading companies as conduits for these sales - four companies located in the United Arab Emirates and two companies located in China. In addition, GQ employees created fictitious bills of lading with incorrect ports of discharge and places of delivery and instructed their customers not to write "Iran" on business documents, such as bills of lading.

#### *Russian National Faces Charges of Illegal Procurement Of U.S. Electronics*

Earlier this month, a federal grand jury handed down a 52-count indictment charging Valery Kosmachov with engineering a scheme to illegally procure sophisticated electronic components from the United States and to smuggle them into the Russian Federation.

According to the indictment filed September 21, 2017, and unsealed this month, Kosmachov is a Russian national, naturalized citizen of Estonia, and resident of Tallinn, Estonia. He served as owner of Adimir OU and co-owner of Eastline Technology OU, along with co-defendant and Russian national Sergey Vetrov, 66. The indictment describes how Kosmachov and Vetrov used the Estonia-based companies as procurement "fronts" to obtain controlled U.S.-origin microelectronics, in part by misrepresenting that the end-users for the components were located in Estonia. The components included dual-use programmable computer chips capable of operating in austere environments making them useful in both civilian and military applications. Once in possession of the chips in Estonia, the co-defendants allegedly later smuggled them into the Russian Federation, in part by using laundered funds.

In sum, Kosmachov, Vetrov, and their two companies are charged with one count of conspiracy to violate the International Emergency Economic Powers Act (IEEPA) and one count of conspiracy to commit international money laundering, in violation of 18 U.S.C. §§ 1956(a)(2)(A) and (h). In addition, Kosmachov and Vetrov are charged with 12 substantive counts of violating the IEEPA, in violation of 50 U.S.C. § 1705, 19 counts of smuggling, in violation of 18 U.S.C. §§ 554 and 2; and 17 counts of international money laundering, in violation of 18 U.S.C. § 1956(a)(2)(A).

#### *Australian National Sentenced to Prison Term for Exporting Electronics to Iran*

An Australian man was sentenced this month to 24 months in prison on four counts of violations of the International Emergency Economic Powers Act,

which criminalizes knowing transactions with Iranian entities without a license from the U.S. Department of Treasury. David Russell Levick, of Cherrybrook NSW, Australia, pled guilty to the charges on Feb. 1, 2019, in the U.S. District Court for the District of Columbia. He was sentenced by the Honorable James E. Boasberg. In addition to the prison term, Levick must pay a forfeiture amount of \$199,227, which represents the total value of the goods involved in the illegal transactions. Following completion of his prison term, Levick will be subject to deportation proceedings.

According to the plea documents, Levick was the general manager of ICM Components, Inc., located in Thornleigh Australia. He solicited purchase orders and business for the goods from a representative of a trading company in Iran. This person in Iran, referenced in court documents as "Iranian A," also operated and controlled companies in Malaysia that acted as intermediaries for the Iranian trading company. Levick then placed orders with U.S. companies on behalf of "Iranian A" for the goods, which were aircraft parts and other items that "Iranian A" could not have directly purchased from the United States without the permission of the U.S. government.

The defendant admitted to procuring or attempting to procure the following items for transshipment to Iran, each of which required a license from the Treasury Department prior to any export to Iran:

- Precision Pressure Transducers. These are sensor devices that have a wide variety of applications in the avionics industry, among others, and can be used for altitude measurements, laboratory testing, measuring instrumentations and recording barometric pressure.
- Emergency Floatation System Kits. These kits contained a landing gear, float bags, composite cylinder and a complete electrical installation kit. Such float kits were designed for use on Bell 206 helicopters to assist the helicopter when landing in either water or soft desert terrain.
- Shock Mounted Light Assemblies. These items are packages of lights and mounting equipment designed for high vibration use and which can be used on helicopters and other fixed wing aircraft.

When necessary, Levick used a broker in Tarpon Springs, Florida, through whom orders could be placed for the parts to further conceal the fact that the parts were intended for transshipment to "Iranian A" in Iran. Levick intentionally concealed the ultimate end-use and end-users of the parts from manufacturers, distributors, shippers, and freight forwarders located in the United States and elsewhere. In addition, Levick and others structured their payments between each other for the parts to avoid trade restrictions imposed on Iranian financial institutions by other countries. Levick and ICM wired money to companies located in the United States as payment for the parts.

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## 13. The FAQ of the Day: DSP-5 and Export Control Reform

(Source: [State/DDTC](#), 27 Apr 2018.)

Q: A foreign company is in receipt of a previously exported article (via DSP-5) that has since transitioned to the EAR. The foreign company now wishes to retransfer the item to an entity not included on the license. Must the company seek DDTC approval via a General Correspondence letter?

A: Because the only item proposed for transfer is now controlled under the EAR (i.e., no longer under the jurisdiction of the Department of State), the company must conduct the re-transfer in accordance with Department of Commerce Export Administration Regulations (EAR). But those items not yet shipped remain subject to the terms and conditions of the USML license until received by the end-user or the license expires or is returned.

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## EX/IM MOVERS & SHAKERS

14. Monday List of Ex/Im Job Openings: 149 Openings  
Posted This Week, Including 22 New Openings  
(Source: Events & Jobs Editor)

Published every Monday or first business day of the week. Please, send job openings in the following format to [jobs@fullcirclecompliance.eu](mailto:jobs@fullcirclecompliance.eu).

\* COMPANY; LOCATION; POSITION TITLE (WEBLINK); CONTACT  
INFORMATION; REQUISITION ID

"#" New or amended listing this week

\* Adient; Plymouth, MI; [Director Americas Regional Compliance](#); Requisition ID: R-03478

\* AeroVironment; Simi Valley, CA; [Trade Compliance Specialist II](#); Requisition ID: 333;

# Agility; Basel, Switzerland; [Sachbearbeiter/in Special Services Air & Ocean Pharma](#);

\* Agility; Dallas, TX; [Ocean Export Coordinator](#);

\* Agility; Houston, TX; [Ocean Export Team Leader](#);

\* Airbus; Manching, Germany; [Export Compliance Officer \(d/m/w\)](#); Requisition ID: 10434415 NK DE EXT 3

\* Airbus; Marignane, France; [Customer Risk & Compliance Analyse](#); Requisition ID: 10441677 FW EN EXT 3

\* Airbus; Munich, Germany; [Internship within Legal & Compliance: Data Protection Mapping](#); Requisition ID: 10436096 NK EN EXT 3

# \* Ajilon; Houston, TX; [Trade Compliance Commodity](#); Requisition ID: US\_EN\_7\_849166\_2640398

- \* Albemarle; Charlotte, NC or Amsterdam, the Netherlands; International Trade Compliance Manager; Requisition ID: REQ-5382
- # Allnex; Drogenbos, Belgium; Head of Trade Compliance EMEA;
- \* AM General; Auburn Hills, MI; International Compliance Analyst;
- \* Amazon Web Services; Seattle, WA; Trade Compliance Manager, Export Controls & Classification; Requisition ID: 787194;
- \* Analog Devices, Inc.; Singapore; Asia Trade Compliance Manager; Requisition ID: 12456
- \* Ansys; Pittsburgh, PA; Paralegal - Compliance and Trade Compliance; Requisition ID: 7535
- \* Autodesk; San Rafael, CA (SF Bay Area) or Portland, OR; Export Compliance Officer; Requisition ID: 19WD31812
- \* Avalara; Seattle, WA or Toronto, Canada; HS Classification Product Manager
- \* Axis Communications; Lund, Sweden; Export Control Advisor - Operations; Requisition ID: 2629
- \* BAE Systems; Nashua, NH; Procurement Compliance; Requisition ID: 44996BR
- \* BAE Systems; Sterling Heights, MI; Senior Procurement Compliance Analyst; Requisition ID: 43034BR
- \* Beiersdorf; Hamburg, Germany; International Trade Expert;
- # Bell Flight; Fort Worth, TX; Trade Compliance Specialist; Requisition ID: 273691
- \* Bloomberg; London, United Kingdom; Trade Compliance Specialist; Requisition ID: 71755
- \* Boeing; Arlington or Fairfax, VA; Sr. Trade Control Specialist; Requisition ID: 1900034991
- \* Bosch USA; Owatonna, MN; Import/Export Compliance Analyst;
- \* Bristol-Myers Squibb; New Brunswick, NJ; Director Global Customs & Trade; Requisition ID: R1509390\_EN
- \* Carnegie Mellon University; Pittsburgh, PA; Export Compliance Manager;
- \* Danaher - Beckman Coulter Diagnostics; Brea, CA; Global Export Compliance Manager; Requisition ID: BEC014282
- \* Danaher - VIQUA; Kitchener, Canada; Trade Compliance and Logistics Specialist; Requisition ID: VIQ000105
- \* DB Schenker; Düsseldorf, Germany; Head of Ocean Freight Import; Requisition ID: 201811140002;
- # DHL Supply Chain; Singapore; Trade Compliance Manager APAC; Requisition ID: req74719
- # DHL Supply Chain; United Kingdom; Compliance Analyst; Requisition ID: req74130
- \* EDCO; Eindhoven, the Netherlands; Customs & Trade Compliance Coordinator;
- \* Elbit Systems of America; Merrimack, NH; Licenses & Agreements Officer; Requisition ID 2019-6948
- \* Element; Edinburgh, United Kingdom; Group Compliance and Communications Assistant; Requisition ID: 2019-3094
- \* Engenium; Orlando, FL; Import/Export Compliance Specialist
- \* Erickson Inc.; Portland or Central Point, OR; Import Specialist; Susan Colletto; Requisition ID 927130;
- \* Ericsson; Mexico City, Mexico; Trade Compliance Operations

- \* Esri; Redlands, CA; Export Compliance Specialist;
- \* Expeditors; Krefeld, Germany; Clerk Import / Export;
- \* Expeditors; Bedford, United Kingdom; Customs Brokerage Clerk;
- \* Expeditors; Frankfurt, Germany; Consultant - Customs and Trade Compliance (m/w), unbefristet und in Vollzeit
- .
- \* Expeditors; Sunnyvale, CA, USA; Customs Compliance Specialist;
- # Five Below; Philadelphia, PA; Custom Trade & Compliance Analyst;
- \* Flexport; San Francisco, CA; Customs Compliance Manager;
- \* FLIR; Elkridge, MD; Global Trade Compliance, Traffic Analyst OTS;
- \* FLIR; multiple locations in the U.S.; Project Coordinator OCR EASE Global Trade Compliance; Requisition ID: REQ11768
- \* Forcepoint; Herndon, Virginia; Sr. Trade Compliance Specialist;
- Requisition ID: JR460234
- \* Fortive - Tektronix; Beaverton, OR; Chief Compliance Counsel;
- \* Fourstar Group USA; Milford, MA; Import Manager/Customs Compliance/Classification Specialist;
- \* GCP Applied Technologies; Cambridge, MA; Trade Compliance Manager;
- \* General Atomics; San Diego, CA; Compliance Specialist; Requisition ID: 22119BR
- \* General Atomics; San Diego, CA; Trade Compliance Classification Leader;
- Requisition ID: 22671BR
- \* General Atomics; San Diego, CA; Export Controls Leader - Technology;
- Requisition ID: 22644BR
- \* General Atomics; San Diego, CA; Import/Export Compliance Specialist;
- Requisition ID: 23069BR
- # GKN Aerospace; Tallahassee, AL; International Trade Compliance Manager;
- \* Gulfstream Aerospace; Savannah, GA; Trade Compliance Project Manager Sr; Requisition ID: 142611
- # Haemonetics; Braintree, MA; Global Trade Compliance Manager;
- Requisition ID: R1516
- \* Harley-Davidson; Milwaukee, WI; Logistics Lead - Trade Compliance;
- Requisition ID: 826
- # Harris Corporation; Van Nuys, CA; Trade Compliance Senior Specialist;
- Richard Wellbrock; Requisition ID: ES20192103-30606
- # Harry Winston; New York, NY; Analyst, Logistics and Trade Compliance;
- # HBM; Marlboro, MA; Export Compliance Manager;
- \* Henderson Group Unlimited, Inc; State Dept, DDTC; Washington, DC; Defense Trade Control Compliance Analyst;
- \* Henderson Group Unlimited, Inc; State Dept, DDTC; Washington, DC; Commodities Jurisdiction Analyst;
- \* Henkel; Rocky Hill, CT; Global Trade Manager; Requisition ID: 190001EB
- \* Honeywell; multiple locations, United States; Export Compliance Manager (North America); Requisition ID: HRD45798;
- \* Honeywell; Prague, Czech Republic; Export Compliance Officer;
- Requisition ID: req179383;
- \* Honeywell International Inc.; Sunnyvale, CA or Lincolnshire, IL; Sr. Import/Export Analyst; HRD32371
- \* Illumina; Great Abington, United Kingdom; Trade Compliance Manager;
- Requisition ID: 16204-JOB



\* Illumina; San Diego, CA; Associate Director, Global Trade Compliance; Requisition ID: 16094-JOB

\* Illumina; Woodlands, Singapore; Manager, Trade Compliance; Requisition ID: 16361-JOB

\* Infineon; El Segundo, CA; Manager, Export Control; Requisition ID: 33841

\* Infineon Technologies; Tijuana, Mexico; Import-Export Manager;

\* IPG Photonics; Oxford, MA; Global Director Trade Compliance;

\* IPG Photonics; Oxford, MA; Global Director Trade Compliance

\* Johnson Controls; Milwaukee, WI; Director, Global Trade Compliance; Requisition ID: WD30055791295;

\* Keeco Home; Hayward, CA; Director Customs and Compliance;

\* Kirkland's; Brentwood, TN; Customs Compliance Program Manager; Requisition ID: 2019-8158

# Koch Chem Tech; Tulsa, OK; Import/Export Compliance Specialist; Requisition ID: 052017

\* KPMG; Chicago, IL or New York, NY or Washington D.C.; Export and Sanctions Compliance Manager; Requisition ID: 41146

\* Kubota; Grapevine, TX; Manager, Import & Export Compliance; Requisition ID: 228

\* Leidos; Columbia, MD; International Trade Manager / Export Compliance; Req. ID: R-00005745;

\* Leonardo DRS; Melbourne, FL; Senior Supply Chain Analyst - Small Business Compliance; Requisition ID: 91669

\* Lockheed Martin; Arlington, VA; International Licensing Analyst; Requisition ID: 468160BR;

\* Lockheed Martin; Grand Prairie, TX; International Trade Compliance Specialist / International Licensing Analyst; Requisition ID: 469631BR

\* Lockheed Martin; Orlando, FL; International Trade Compliance Specialist / International Licensing Analyst; Requisition ID: 467458BR

\* Lockheed Martin Missile and Fire Controls; Orlando, FL; International Trade Compliance Staff; Contact: Marjorie Alquist, +1 407-356-9061; Requisition ID: 473481BR

\* Lockheed Martin Missile and Fire Controls; Orlando, FL or Dallas, TX; International Trade Compliance Engineer Staff; Contact: Brian Taylor, +1 407-356-3833; Requisition ID: 462509BR

# Lufthansa Technik; East Meadow, NY; Customs and International Trade Manager Americas (Compliance & Standards)(M/F);

\* Lutron Electronics Co; Lehigh Valley, PA; Trade Compliance Coordinator; Requisition ID: 4025;

\* Masonite; Charlotte, NC; Customs Compliance Specialist; Requisition ID: 2019-16989

\* Meggitt; Miami, FL; Trade Compliance Coordinator; Requisition ID: 37514

\* Meggitt; Rockmart, GA; Trade Compliance Coordinator; Requisition ID: 37846

\* Metso; Waukesha, WI or York, PA or Columbia, SC; Logistics Trade Compliance Manager; Requisition ID: 83793

\* Mohawk Global Trade Advisors; Chicago, IL; Vice President and General Manager of Consulting Division; Contact: CSardella@mohawkglobal.com;

\* Newell Brands; Norwalk, CT; Manager of Trade Operations;

\* Northrop Grumman; Herndon, VA; Principal International Trade Compliance Analyst Level 3 or 4; Requisition ID: 19007160



\* Northrop Grumman; Rancho Bernardo, CA; Sr. Manager, International Trade Compliance; Contact: Fred Czarske at 310-332-7606, [fred.czarske@ngc.com](mailto:fred.czarske@ngc.com); Requisition ID: 19008010

\* NXP Semiconductors; Eindhoven, The Netherlands; (Senior) Manager Customs Compliance; Requisition ID: R-10013630;

# Parexel; Kiev, Ukraine; Trade Compliance Specialist; Requisition ID: 51579BR

\* PCC Forged Products - Wyman-Gordon; Houston, TX; Division Trade Compliance Manager; Requisition ID: 20961

\* PerkinElmer; Shelton, CT or Boston, MA or Hopkinton, MA or Waltham, MA; Senior Director Global Transportation and Logistics; Requisition ID: JR-004907

\* Philips; Best, the Netherlands; Head of Trade Compliance; Requisition ID: 308818

\* Pinpoint Pharma; Lincolnshire, IL; Export Compliance Specialist; Requisition ID: 351;

\* PwC; Houston, TX; Customs and International Trade Director; Requisition ID: 38150WD;

\* Ralph Lauren; New York, NY; Director, Trade Compliance Analyst; Requisition ID: 5567761;

# Raytheon; El Segundo, CA; Import Ctrl&Compliance Advisor; Requisition ID: 136269BR

\* Raytheon; Tuscon, AZ; Manager Export-Import Control; Requisition ID: 134614BR

\* Raytheon; Tuscon, AZ; Senior Export Licensing and Compliance Specialist; Requisition ID: 135002BR;

\* Richemont; Fort Worth, TX; Import/Export Manager; Requisition ID: 8837;

\* Rohde Schwarz; Munich, Germany; Spezialist Exportkontrolle (m/w)

# Rolls-Royce; Derby, United Kingdom; Export Control Manager; Requisition ID: JR6042437

\* SABIC; Houston TX; Senior Analyst, Trade Compliance; [Danielle.Cannata@sabic.com](mailto:Danielle.Cannata@sabic.com); Requisition ID: 8411BR

\* Scania; Sodertalje, Sweden; Export Control Officer; Requisition ID: 20190885

\* Shell; Krakow, Poland; Trade Compliance Manager; Requisition ID: 100384BR;

\* Siemens; München, Germany; Director (m/f) Compliance Audit - Export Controls and Customs (ECC); Requisition ID: 104465

# Sierra Nevada Corporation; Arlington, VA; International Trade Compliance Analyst I; Requisition ID: R0007830

\* Sierra Nevada Corporation; Arlington, VA; International Trade Compliance Analyst II; Requisition ID: R0007508

\* Signify; Eindhoven or Amsterdam, the Netherlands; Legal Export Control Officer; Requisition ID: 289784

# Solenis; Wilmington, DE; Global Trade Compliance Specialist II; Requisition ID: R0002807

\* Spirit AeroSystems Inc; Wichita, KS; Import/Export Administration; Requisition ID: 2019-3798

\* StanleyBlack&Decker; Southington, CT; Trade Compliance Specialist/Analyst; Requisition ID: 58390BR

- \* TE Connectivity; El Cajon, CA or Middletown, PA; Licensing Specialist; [tbaker@te.com](mailto:tbaker@te.com); Requisition 40514
- \* Teledyne Semiconductors; Saint-Egrève/Grenoble, France; Trade Compliance Manager; Requisition ID: 2019-8459;
- # Teledyne Technologies; Mountain View, CA; Trade Compliance Import Administrator; [Janice Whitaker](#); Requisition ID: 2019-9078;
- \* Textron Aviation; Wichita, KS; Trade Compliance Analyst; Requisition ID: 269127
- \* Thales; Stuttgart, Germany; Trade Compliance Spezialist (M/W/D); Requisition ID: R0054290
- \* ThermoFisher Scientific; Monza, Italy; Trade Compliance Specialist - Pharma; Requisition ID: 88807BR
- \* ThermoFisher Scientific; Loughborough, United Kingdom; Global Trade Compliance Manager; Requisition ID: 90337BR
- \* Trek Bicycle; Waterloo, WI; Trade Compliance Manager
- \* Twitter; San Francisco, CA; Snr Compliance Counsel - Investigations and Trade Compliance
- \* U.S. Department of State; Washington D.C.; Compliance Specialist; Requisition ID: PM-2019-0011
- \* U.S. Department of State; Washington D.C.; Compliance Specialist; Requisition ID: PM-2019-0012
- # U.S. Department of State/Directorate of Defense Trade Controls; Washington D.C.; Attorney [Multiple positions]; [legaljobs@state.gov](mailto:legaljobs@state.gov).
- \* U.S. Department of the Army - U.S. Army Security Assistance Command; Redstone Arsenal, AL; Security Assistance Policy Specialist; Requisition ID: 60590
- \* United Technologies - Collins Aerospace; Danbury, CT; Fall CO-OP, International Trade Compliance; Requisition ID: 01295830
- \* United Technologies - Pratt & Whitney; East Hartford, CT; ITC Licensing Specialist; Requisition ID: 01289652
- \* University of California; San Francisco, CA; Export Control Officer; Requisition ID: 51010;
- \* University of Michigan; Ann Arbor, MI; Export Controls Research Compliance Specialist Associate; Requisition ID: 169019
- \* University of Missouri; Columbia, MO; Compliance Manager; Requisition ID: 29426
- # UPS; Münchenstein, Switzerland; Customs & Trade Compliance Coordinator; Requisition ID: 052228
- \* Velocity Electronics; Austin, TX; Director of Global Trade Compliance
- \* Veridos GmbH; München, Germany; Ausfuhrbeauftragter (Export Control Officer m/w/d); Requisition ID: 1677
- \* Volt; Rogers, MN; Trade Compliance Specialist; Requisition ID: 167100
- \* VT iDirect; Herndon, VA; Manager, Global Logistics; Requisition ID: 2018R-3120-1; [psingh@idirect.net](mailto:psingh@idirect.net)
- \* Walt Disney; Kissimmee, FL; Export Compliance Analyst; Requisition ID: 634260BR
- \* Wealth Ocean; Newport Beach, CA; Marketing & International Trade Specialist;
- \* Wellesley Asset Management; Wellesley, MA; Chief Compliance Officer;
- \* Xilinx; San Jose, CA; Trade Compliance Specialist; Requisition ID: 155901

\* Xpand Group: Hong Kong, China; Compliance Analyst; Requisition ID: G-REQ-00169936  
\* YETI Coolers; Austin, TX; Inbound Logistics and Trade Compliance Manager

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#### EX/IM TRAINING EVENTS & CONFERENCES

### 15. ECS Presents "Mastering ITAR/EAR Challenges" on 30 Apr-1 May in Nashville, TN

(Source: S. Palmer, [spalmer@exportcompliancesolutions.com](mailto:spalmer@exportcompliancesolutions.com).)

- \* What: Mastering ITAR/EAR Challenges; Nashville, TN
- \* When: April 30-May 1, 2019
- \* Where: Renaissance Nashville Hotel
- \* Sponsor: Export Compliance Solutions (ECS)
- \* ECS Speaker Panel: Suzanne Palmer; Lisa Bencivenga; Timothy Mooney, Debi Davis, Matthew McGrath, Matt Doyle
- \* Register here or by calling 866-238-4018 or email [spalmer@exportcompliancesolutions.com](mailto:spalmer@exportcompliancesolutions.com)

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## 16. FCC Presents "An Introduction to EU / Dutch Dual-Use and Military Export Controls", 7 May in Bruchem, the Netherlands

(Source: [Full Circle Compliance](#), [events@fullcirclecompliance.eu](mailto:events@fullcirclecompliance.eu).)

This 1-day training course is ideally suited for compliance professionals and those in a similar role who aim to gain a better understanding of EU and Dutch export control laws and regulations and industry's best practices to ensure compliance.

The course will cover multiple topics relevant for organizations subject to EU and Dutch dual-use and/or military export controls, including: the EU and Dutch regulatory framework; key concepts and definitions; practical tips regarding classification and licensing, and for ensuring a compliant shipment; identifying red flag situations and handling (potential) non-compliance issues; and the latest developments regarding Internal Compliance Program requirements in the EU and the Netherlands.

\* Training Event: "An Introduction to EU / Dutch Dual-Use and Military Export Controls" (in Dutch)

\* Date: Tuesday, 7 May 2019

\* Location: Full Circle Compliance, Landgoed Groenhoven, Dorpsstraat 6, Bruchem, The Netherlands

\* Times:

- Registration and welcome: 9.00 am - 9.30 am

- Training course hours: 9.30 am - 4.00 pm

\* Level: Awareness / Beginner.

\* Target Audience: Compliance professionals or those in a similar role in any industry affected by EU/Dutch export controls (e.g., manufacturing, logistics, research & development, aerospace & defense, government, etc.).

\* Instructors: Marco F.N. Crombach MSc (Senior Manager) & Vincent J.A. Goossen MA (Senior Associate).

\* Information & Registration: click [here](#) or contact us at [events@fullcirclecompliance.eu](mailto:events@fullcirclecompliance.eu) or 31 (0)23 - 844 - 9046.

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## EDITOR'S NOTES

### 17. Bartlett's Unfamiliar Quotations

(Source: Editor)

\* **Rene Descartes** (31 Mar 1596 - 11 Feb 1650; was a French philosopher, mathematician, and scientist. Descartes' *Meditations on First Philosophy* (1641) continues to be a standard text at most university philosophy departments. Descartes' influence in mathematics is equally apparent; the Cartesian coordinate system was named after him. He is credited as the

father of analytical geometry, used in the discovery of infinitesimal calculus and analysis. Descartes was also one of the key figures in the Scientific Revolution. His best known philosophical statement is "*I think, therefore I am*" (Latin: Ego cogito, ergo sum), found in *Discourse on the Method and Principles of Philosophy*.)

- "*Whenever anyone has offended me, I try to raise my soul so high that the offense cannot reach it.*"

- "*Divide each difficulty into as many parts as is feasible and necessary to resolve it.*"

\* **Charles de Saint-Évremond** (Charles de Marguetel de Saint-Denis (1 Apr 1613 - 29 Sep 1703; was a French soldier, hedonist, essayist, and literary critic.)

- "*The greater the difficulty, the more the glory in surmounting it.*"

- "*Skillful pilots gain their reputation from storms and tempest.*"

### **Monday is pun day:**

\* What do you do with a dead chemist? Barium.

\* I bet the person who created the door knocker won a Nobel prize.

\* Towels can't tell hilarious jokes. They have a dry sense of humor.

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## **18. Are Your Copies of Regulations Up to Date?**

(Source: Editor)

\* DHS CUSTOMS REGULATIONS: 19 CFR, Ch. 1, Pts. 0-199. Implemented by Dep't of Homeland Security, U.S. Customs & Border Protection.

- Last Amendment: 12 Mar 2019: 84 FR 8807-8809: Extension of Import Restrictions Imposed on Archaeological and Ecclesiastical Ethnological Material From Honduras

\* DOC EXPORT ADMINISTRATION REGULATIONS (EAR): 15 CFR Subtit. B, Ch. VII, Pts. 730-774. Implemented by Dep't of Commerce, Bureau of Industry & Security.

- Last Amendment: 20 Dec 2018: 83 FR 65292-65294: Control of Military Electronic Equipment and Other Items the President Determines No Longer Warrant Control Under the United States Munitions List (USML); Correction [Concerning ECCN 7A005 and ECCN 7A105.]

\* DOC FOREIGN TRADE REGULATIONS (FTR): 15 CFR Part 30. Implemented by Dep't of Commerce, U.S. Census Bureau.

- Last Amendment: 24 Apr 2018: 83 FR 17749-17751: Foreign Trade Regulations (FTR): Clarification on the Collection and Confidentiality of Kimberley Process Certificates

- HTS codes that are not valid for AES are available [here](#).

- The latest edition (1 Jan 2019) of *Bartlett's Annotated FTR* ("BAFTR"), by James E. Bartlett III, is available for downloading in Word format. The BAFTR contains all FTR amendments, FTR Letters and Notices, a large Index, and approximately 250 footnotes containing case annotations, practice tips,

Census/AES guidance, and explanations of the numerous errors contained in the official text. Subscribers receive revised copies in Microsoft Word every time the FTR is amended. The BAFTR is available by annual subscription from the Full Circle Compliance [website](http://www.FullCircleCompliance.eu). BITAR subscribers are entitled to a 25% discount on subscriptions to the BAFTR. Government employees (including military) and employees of universities are eligible for a 50% discount on both publications at [www.FullCircleCompliance.eu](http://www.FullCircleCompliance.eu).

\* DOD NATIONAL INDUSTRIAL SECURITY PROGRAM OPERATING MANUAL (NISPOM): DoD 5220.22-M. Implemented by Dep't of Defense.

- Last Amendment: 18 May 2016: Change 2: Implement an insider threat program; reporting requirements for Cleared Defense Contractors; alignment with Federal standards for classified information systems; incorporated and cancelled Supp. 1 to the NISPOM (Summary [here](#).)

\* DOE ASSISTANCE TO FOREIGN ATOMIC ENERGY ACTIVITIES: 10 CFR Part 810; Implemented by Dep't of Energy, National Nuclear Security Administration, under Atomic Energy Act of 1954.

- Last Amendment: 23 Feb 2015: 80 FR 9359, comprehensive updating of regulations, updates the activities and technologies subject to specific authorization and DOE reporting requirements. This rule also identifies destinations with respect to which most assistance would be generally authorized and destinations that would require a specific authorization by the Secretary of Energy.

\* DOE EXPORT AND IMPORT OF NUCLEAR EQUIPMENT AND MATERIAL; 10 CFR Part 110; Implemented by Dep't of Energy, U.S. Nuclear Regulatory Commission, under Atomic Energy Act of 1954.

- Last Amendment: 20 Nov 2018, 10 CFR 110.6, Re-transfers.

\* DOJ ATF ARMS IMPORT REGULATIONS: 27 CFR Part 447-Importation of Arms, Ammunition, and Implements of War. Implemented by Dep't of Justice, Bureau of Alcohol, Tobacco, Firearms & Explosives.

- Last Amendment: 14 Mar 2019: 84 FR 9239-9240: Bump-Stock-Type Devices

\* DOS INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR): 22 C.F.R. Ch. I, Subch. M, Pts. 120-130. Implemented by Dep't of State, Directorate of Defense Trade Controls.

- Last Amendment: 19 Mar 2019: 84 FR 9957-9959: Department of State 2019 Civil Monetary Penalties Inflationary Adjustment.

- The only available fully updated copy (latest edition: 19 Mar 2019) of the ITAR with all amendments is contained in *Bartlett's Annotated ITAR* ("BITAR"), by James E. Bartlett III. The BITAR contains all ITAR amendments to date, plus a large Index, over 800 footnotes containing amendment histories, case annotations, practice tips, DDTC guidance, and explanations of errors in the official ITAR text. Subscribers receive updated copies of the BITAR in Word by email, usually revised within 24 hours after every ITAR amendment. The BITAR is available by annual subscription from the Full Circle Compliance [website](http://www.FullCircleCompliance.eu). BAFTR subscribers receive a \$25

discount on subscriptions to the BITAR, please [contact us](#) to receive your discount code.

\* [DOT FOREIGN ASSETS CONTROL REGULATIONS \(OFAC FACR\)](#): 31 CFR, Parts 500-599, Embargoes, Sanctions, Executive Orders. Implemented by Dep't of Treasury, Office of Foreign Assets Control.  
- Last Amendment: 15 Mar 2019: [84 FR: 9456-9458](#): List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanctions (CAPTA List)

\* [USITC HARMONIZED TARIFF SCHEDULE OF THE UNITED STATES \(HTS, HTSA or HTSUSA\)](#), 1 Jan 2019: 19 USC 1202 Annex. Implemented by U.S. International Trade Commission. ("HTS" and "HTSA" are often seen as abbreviations for the Harmonized Tariff Schedule of the United States Annotated, shortened versions of "HTSUSA".)  
- Last Amendment: 25 Mar 2019: [Harmonized System Update 1904](#), contains 1,015 ABI records and 194 harmonized tariff records  
- HTS codes for AES are available [here](#).  
- HTS codes that are not valid for AES are available [here](#).

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## 19. Weekly Highlights of the Daily Bugle Top Stories (Source: Editor)

Review last week's top Ex/Im stories in "Weekly Highlights of the Daily Bugle Top Stories" published [here](#).

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## EDITORIAL POLICY

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